

BELDOCK LEVINE & HOFFMAN LLP
99 PARK AVENUE, PH/26TH FLOOR
NEW YORK, N.Y. 10016

CYNTHIA ROLLINGS
JONATHAN MOORE
JONATHAN K. POLLACK
HENRY A. DLUGACZ
STEPHEN J. BLUMERT
MARC A. CANNAN
DAVID B. RANKIN
LUNA DROUBI
MYRON BELDOCK (1929-2016)
LAWRENCE S. LEVINE (1934-2004)
ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400
FAX: (212) 277-5880
WEBSITE: blhny.com

COUNSEL
BRUCE E. TRAUNER
PETER S. MATORIN
KAREN L. DIPPOLD
JEFFREY A. GREENBERG
MARJORY D. FIELDS
EMILY JANE GOODMAN
(JUSTICE, NYS SUPREME COURT, RET.)
FRANK HANDELMAN

REF: 8289.15

WRITER'S DIRECT DIAL:
212-277-5825

August 12, 2019

BY ECF

Honorable Paul A. Engelmayer
United States District Judge
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records, et al. v. U.S. Department of Veterans Affairs*, 18 Civ. 8449 (PAE)

Your Honor:

My name is David B. Rankin. I represent the plaintiffs in the above entitled action. I write to request additional time respond to the defendant's summary judgement motion. This is the first request for this relief and is done with the consent of the defendant.

Presently, the plaintiffs' papers are due on September 9, 2019. The basis for this request is that the I will be out of the County in August and early September, then I am conducting the trial of *Thomas v. Yonkers*, 17-cv-04025 (VB).

Respectfully, plaintiff requests:

Response to defendants' motion October 11, 2019; and
Governments opposition and reply November 1, 2019.

We thank the Court for its consideration of this matter.

Respectfully submitted,



David B. Rankin